

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS

Plaintiffs )  
STEVEN BURNETT )  
DAVID JONES )  
JEREMY ELDERS )  
CIARA MORGAN )  
SCHYLER MELVIN )

vs. )

Defendants )  
COMBINED VETERANS ASSOC )  
BRENDA JEFFERSON )  
IL DEPT OF AGRICULTURE )  
TIBRETTA REIMAN )

**FILED**

**OCT 17 2018**

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
BENTON OFFICE

18-CV-1987-NJR-RJD

NOW ENTERS THE PLAINTIFF'S, STEVEN N. BURNETT, DAVID E. JONES, JEROME B. ELDERS, CIARA M. MORGAN, and SCHYLER E. MELVIN, claims that the Defendant's named above violated federal work laws, discrimination and libel and or slander as outlined below.

1) That all Plaintiff's are residents of Illinois and all plaintiff's worked for the Defendant, COMBINED VETERANS ASSOCIATION, hereby abbreviated CVA, during the Du Quoin State Fair in Du Quoin, Illinois between the dates of August 24 to September 3, 2018.

2) The Defendant, CVA is operated by office Manager BRENDA JEFFERSON in which CVA and BRENDA JEFFERSON

operates the business and lives in Springfield, Illinois and was contracted through the Defendant, Illinois Department of Agriculture.

3) The Defendant, Illinois Department of Agriculture, hereby abbreviated IDA, is an entity in Du Quoin, Illinois and the Defendant, TIBRETTA REIMAN is an employee of IDA and resides in Illinois.

4) On August 24 and 25, 2018, Plaintiff's reported to work upon where the Defendant, BRENDA JEFFERSON through CVA and under contract with IDA, made copies of Plaintiff's drivers license and social security card.

5) Plaintiff's were hired by Defendant, BRENDA JEFFERSON through CVA to work parking detail in which Plaintiff's parked vehicles and secured gates during the Du Quoin State Fair which is ran by Defendant, IDA.

6) Defendant, BRENDA JEFFERSON, had Plaintiff's report to work approximately 30 minutes to an hour before the scheduled shift during the whole time during the fair. Plaintiff's wish to cite that this is in violation of Fair Labor Standards Act and Lilly Ledbetter Fair Pay Act of 2009, considering that Plaintiff's were not getting paid for that time.

7) On August 29, 2018, due to the fact that

Defendant, BRENDA JEFFERSON, did not state Plaintiff's hourly wage, Plaintiff, STEVEN BURNETT with Plaintiff DAVID JONES as a witness, asked Defendant, BRENDA JEFFERSON, if the Plaintiff's were receiving minimum wage for the work during the fair. Defendant, BRENDA JEFFERSON, paused for five seconds before answering yes, that the Plaintiff's were receiving minimum wage.

8) During the fair, Plaintiff's, SCHYLER MELVIN and CIARA MORGAN, both became exhausted by heat. Plaintiff, CIARA MORGAN, was vomitting on September 3, 2018 in which Defendant, BRENDA JEFFERSON, stated to her not to be vomitting in front of people. Plaintiff, CIARA MORGAN, was offered no relief or water.

9) On September 2, 2018, Defendant, BRENDA JEFFERSON, stated to Plaintiff, STEVEN BURNETT, that "you haven't heard me bitch yet." Plaintiff, STEVEN BURNETT, stated to Defendant, BRENDA JEFFERSON, that "I do not apprteciate that tone." Defendant, BRENDA JEFFERSON, then stated stated to Plaintiff, STEVEN BURNETT, "well you don't have to sign in if you don't want to." Plaintiff, STEVEN BURNETT, had already signed in and walked out of the media office where Defendant, BRENDA JEFFERSON, had her office at, in which Plaintiff, STEVEN BURNETT was going to work at his post. During this time,

Plaintiff, STEVEN BURNETT, heard Defendant, BRENDA JEFFERSON, speaking to another employee of CVA in the media office. Defendant, BRENDA JEFFERSON, said the word "shit" in which Plaintiff, STEVEN BURNETT, who was approximately 40 feet from the media office, repeated what the Defendant, BRENDA JEFFERSON, had said and said the word "shit." Defendant, BRENDA JEFFERSON, came frantically running out of the office and told Plaintiff, STEVEN BURNETT, to turn in his badge which was attached to a landlier made of cloth. Defendant, BRENDA JEFFERSON, was invading the space of Plaintiff, STEVEN BURNETT, by standing less than a foot away from Plaintiff. Plaintiff then took the landlier and simply dropped it in Defendant's, BRENDA JEFFERSON, hands. Defendant then told Plaintiff, STEVEN BURNETT, that if I threw anything else at her that she, Defendant, BRENDA JEFFERSON, "would kick me in the butt." Plaintiff cites AFFIRMITIVE ACTION under TITLE VII for wrongfully being terminated and being treated unfairly by Defendant, BRENDA JEFFERSON.

10) Plaintiff, CIARA MORGAN, became sick from working at the fair and has worsened since then.

11) Defendant, BRENDA JEFFERSON, stated to

Plaintiff's, CIARA MORGAN, STEVEN BURNETT and JEREMY ELDERS, that we recruited by someone else and that she didn't want us working there anyway. Plaintiff's cite Employment Discrimination under Section 1981.

12) Defendant, TIBRETTA REIMAN, stated that the Plaintiff's chose to work for Defendant, CVA. Plaintiff's, STEVEN BURNETT and JEREMY ELDERS filed an application for the Defendant, IDA, however, Plaintiff's were forced to work under the Defendant, CVA. Plaintiff's again cite Employment Discrimination.

13) Plaintiff, STEVEN BURNETT, upon filing an application with Defendant, IDA, noted that Plaintiff had a disability in which Plaintiff has an on going disability case pending. Plaintiff is citing Americans with Disabilities Act of 1990.

14) Plaintiff, CIARA MORGAN, was told by Defendant, Brenda Jefferson that she was a female and was too short to be parking vehicles. Plaintiff cites Employment Discrimination under Section 1981.

15) Defendant, BRENDA JEFFERSON, called the Du Quoin Police Department and either told them or wrote a report that Plaintiff, STEVEN BURNETT, was calling and harassing her by phone. Plaintiff only text Defendant on approximately three different occasions. Plaintiff is

citing slander/libel due to the fact that other CVA workers have repeatedly called Defendant in which she just hangs up on them and not calling the police on them.

16) Plaintiff's are seeking restitution as follows:

A) All court costs and fees be paid for by Defendants.

B) Plaintiff's are seeking pay from hourly wages worked from Defendant's and interest owed from late fees

C) Plaintiff's are seeking damages from Defendant's for \$5,000 for each Plaintiff with Plaintiff, CIARA MORGAN, requesting an additional \$10,000 for medical expenses and sickness she suffered during the fair.

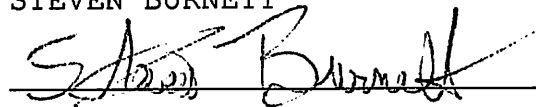
D) Plaintiff's implore court to allow any other fines or fees to be paid for by Defendant's to Plaintiff's for the citations listed above.

17) Plaintiff's signatures show that these statements and citations are true and accurate and also the signatures represent that all Plaintiff's are indigent and have no income or very little for future filing of this case under due hardship.

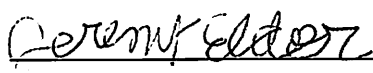
18) An appendix has been attached with addresses of

Plaintiff's and Defendant's.

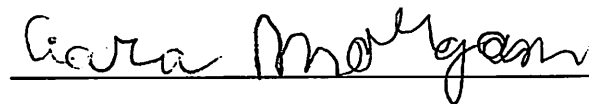
STEVEN BURNETT

\_\_\_\_\_

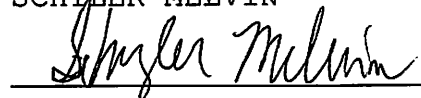
JEREMY ELDERS

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CIARA MORGAN

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SCHYLER MELVIN

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DAVID JONES

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**APPENDIX**

**Plaintiff's**

Steven Burnett  
109 South Division St  
Apt 512  
Du Quoin, IL  
62832

Jeremy Elders and Ciara Morgan  
119 North Chestnut  
Apt 2  
Du Quoin, IL

David Jones  
615 West North St  
Du Quoin, IL  
62832

Schyler Melvin  
1464 N Division  
Du Quoin, IL  
62832

**DEFENDANT'S**

CVA  
1908 Cedar St  
Springfield, IL  
62703  
c/o Brenda Jefferson

IDA  
655 Executive Dr  
Du Quoin, IL  
62832  
c/o Tibretta Reiman